

295726

2020-279-E

ACCEPTED FOR PROCESSING - 2020 December 2 3:29 PM - SCPSC - 2020-279-E - Page 1 of 6

Duke, Daphne

Subject: FW: [External] Utility Complaint Filing
Attachments: Skylyn complaint.pdf; 202012011425.pdf

From: Oliver Klicker <oliver@sunppm.com>
Sent: Tuesday, December 1, 2020 5:28 PM
To: PSC_Contact <Contact@psc.sc.gov>
Subject: [External] Utility Complaint Filing

Hi There,

Please accept the attached materials as a formal complaint against Duke Carolinas.

Thank you so much,

Oliver

--

Oliver Klicker, Commercial Project Manager

Power Production Management, Inc.

"Solar is Our Passion"

Cell: 352-989-6375

Fax: 866-228-1581

Main: 866-828-3337



POWERTM
PRODUCTION MANAGEMENT, INC.

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www.sunppm.com

www.facebook.com/SunPPM

625 NW 8th Avenue,

Gainesville, FL 32601

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November 17, 2020

To: South Carolina Public Service Commission

From: Pacifica Companies

About: Skylyn SC2018-01289 Account No: [REDACTED]

Duke Energy Carolinas has caused a three-year delay and a cost over-run of over \$100,000 on our solar project located at 1705 Skylyn Drive, Spartanburg, SC, 29307. We currently have two projects related to Duke Energy Carolinas, one in South Carolina, and one in North Carolina. These projects started back in 2017. We have had a three-year history of difficulty with Duke Energy on this one project in particular.

What should have been a simple request for interconnection has turned into 3 years of back and forth with no end in sight. We have a project in Spartanburg, SC called Skylyn Senior Living, which is a solar installation on three existing buildings. We originally applied with a design that we have used with multiple other utilities around the country and Duke refused to approve it. This decision by Duke delayed the project over a year while we searched to find the only possible solution, which has cost an additional \$100,000.

We have now re-submitted the three interconnection requests to the utility and they approved two but lost one, twice. Every time we have communicated with them, it would take anywhere from 2 weeks to 2 months at a time to get back to us. Sometimes they do not get back to us at all. It is impossible to get in touch with anyone directly. Due to the way that the organization is structured, communication is completely opaque and there are neither direct lines nor direct emails. Everything goes to generic emails and there is no one person we are able to work with directly, and no direct line to speak with the same person each time.

We are simply trying to get this project's interconnection agreement approved and have told them we would do anything to make that happen. They continue to obscure the process and push further delays.

Sincerely,

A handwritten signature in dark ink, appearing to read "D. Sappa", is written over the word "Sincerely,".

Divya Sappa

Director, Investments and Strategic Operations

Pacifica Companies

1775 Hancock Street, Suite 200 | San Diego, CA 92110

T (619) 296-9000 x143 | M (619) 534-7360

DSappa@PacificaCompanies.com

1775 Hancock Street, Suite 200 • San Diego, CA 92110

(619) 296-9000 • Fax (619) 296-9090

www.pacificahost.com • www.pacificacompanies.com

Complete Form, Print, Sign and Mail to:
Public Service Commission of South Carolina
101 Executive Center Dr., Suite 100
Columbia, SC 29210



Phone: 803-896-5100
Fax: 803-896-5199
www.psc.sc.gov

Text PSCAGENDAS to 39492

To receive an alert when Meeting Agendas are released

Individual Complaint Form

Date*: 11/16/2020

Complainant or Legal Representative Information: * Required Fields	
Name *	<u>Divya Sappa</u>
Firm (if applicable)	<u>Pacifica Companies</u>
Mailing Address *	<u>1775 Hancock Street, Suite 200</u>
City, State Zip *	<u>San Diego, CA 92110</u>
Phone *	<u>6195347360</u>
E-mail	<u>dsappa@pacificacompanies.com</u>
Name of Utility Involved in Complaint: * <u>Duke Energy</u>	

Type of Complaint (check appropriate box below.) *			
<input type="checkbox"/> Billing Error/Adjustments	<input type="checkbox"/> Deposits and Credit Establishment	<input type="checkbox"/> Wrong Rate	<input type="checkbox"/> Refusal to Connect Service
<input type="checkbox"/> Disconnection of Service	<input type="checkbox"/> Payment Arrangements	<input type="checkbox"/> Water Quality	<input type="checkbox"/> Line Extension Issue
<input type="checkbox"/> Service Issue	<input type="checkbox"/> Meter Issue		
<input checked="" type="checkbox"/> Other (be specific) <u>Continuous delay in approval of solar interconnection agreement</u>			
Have you contacted the Office of Regulatory Staff (ORS)? *		Name of ORS Contact:	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			

Concise Statement of Facts/Complaint: * (This section must be completed. Attach additional information to this page if necessary.)
<u>Please See attached page</u>

Relief Requested: * (This section must be completed. Attach additional information to this page if necessary.)
<u>Interconnection agreement approval for the third and final interconnection agreement we submitted months ago that is still pending. Project Name: Skylyn SC2018-01289 Account No:</u>
I UNDERSTAND AND AGREE THAT THE INFORMATION GIVEN ON THIS FORM IS PUBLIC INFORMATION THAT WILL BE PUBLISHED ON THE COMMISSION'S WEBSITE (dms.psc.gov), AND I UNDERSTAND SUCH INFORMATION MAY BE SUBJECT TO PUBLIC SCRUTINY OR FURTHER RELEASE.
<u>S. Sappa</u> Complainant's Signature (MUST BE SIGNED, DO NOT PRINT)

STATE OF SOUTH CAROLINA)
COUNTY OF _____)

VERIFICATION

I, Divya Sappa, Complainant's Name * verify that I have read my complaint filed on 11-19-2020 Date *

and know the contents thereof, and that said contents are true.

S. Sappa
Complainant's Signature * (MUST BE SIGNED, DO NOT PRINT)

Internal Use Only	
Processed By	Date
H.E.	



Individual Complaint Form Instructions and Procedure

Please contact the **Office of Regulatory Staff (ORS)** at 803-737-5230 (Columbia, SC) or 800-922-1531 (toll free) to attempt to informally resolve this issue prior to filing an official complaint with the Commission.

A. To file an official complaint:

1. Complete the **Complaint Form** found on the Commission's website at www.psc.sc.gov.
 - a.) The form may be completed and e-mailed to contact@psc.sc.gov.
 - b.) Alternatively, a blank copy of the form may be printed, filled out, and then mailed or faxed to the Commission.
2. Individuals do not need to have legal representation to represent themselves before the Commission, but a corporation, partnership, limited liability company, or group of people or association must be represented by legal counsel. Neither the Commission nor the ORS can provide legal advice.
3. If additional documentation is necessary to supplement your complaint, attach it to the form. The Public Service Commission of South Carolina has adopted the same standards regarding protection of personal identifying information as are in place in the various state courts (except Family and Probate Courts). These are set out in Rule 41.2(a) of the South Carolina Rules of Civil Procedure and are listed below:
 - a) **Redaction.** A person filing a document in paper or electronic format shall not include, or will redact where inclusion is necessary, the following personal identifying information.
 - b) **Social Security Numbers, Taxpayer Identification Numbers, Driver's License Numbers, Passport Numbers or Any Other Personal Identifying Numbers.** If it is necessary to include personal identifying numbers in a document, the parties should utilize some other identifier. Parties shall not include any portion of a social security number in a filing.
 - c) **Names of Minor Children.** If a minor is the victim of a sexual assault or the victim in an abuse or neglect case, the minor's name must be completely redacted and a term such as "victim" or "child" should be used. In all other cases, the minor's first name and first initial of the last name (i.e., John S.), or only the minor's initials (i.e., J.S.) should be used.
 - d) **Financial Account Numbers, Including Any Type of Bank Account Numbers, Personal Identification Number (PIN) Code, or Passwords.** If financial account numbers are relevant, only the last four digits of these numbers should be used.
 - e) **Home Addresses of Minors, Sexual Assault and Abuse and Neglect Victims, and Non-Parties.** If a home address of a minor, sexual assault victim, or non-party must be included, only the city and state should be used.
 - f) **Date of Birth.** If a date of birth must be included, only the year of birth should be included.

Individuals who file documents with the Public Service Commission are hereby notified that their filings will be made available to the public on the Commission's searchable Docket Management System. The Public Service Commission assumes no responsibility for redacting personal identifying information from any filings. It is solely the responsibility of the filer to ensure that no personal identifying information is made public by inclusion in his or her filings.

I have read and understand the Public Service Commission's policy pertaining to privacy protection for filings.

Signature of Filer: _____

A handwritten signature in black ink, appearing to read "P. Dwyer", is written over a horizontal line.

4. The Commission hears matters involving regulated utilities, but cannot award any monetary damages other than refunds for overpayments.
 5. Complete the section of the form regarding publishing the contents of the complaint on the Commission's website (dms.sc.gov).
 6. Complete the Verification section of the form. The form must be dated and signed before it will be processed. The information presented in the complaint form will serve as your pre-filed testimony for your case. It is important that your Statement of Facts be accurate and concise.
- B. Your complaint will be processed by the Clerk's Office and assigned a docket number.
- C. A Hearing Examiner will be appointed to your case.
- D. You will receive a letter notifying you of the date of your hearing before the Commission.
- E. After the Docketing Department has assigned a docket number, you can review your case online by accessing the Commission's **Docket Management System (DMS)** (<http://dms.psc.sc.gov/dockets>). To view your case, enter the docket number assigned to your case. The docket number is in the format yyyy-~~nnn~~-l (e.g. 2009-401-E) and will be located on any correspondence to you from the Commission.
- F. After the docket is established, any mailings or requests to the Commission must be copied to all parties of record listed in the docket.
- G. You must continue to make timely payments on any undisputed amounts on your account while your case is pending before the Commission or your service may be disconnected.